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Attorney for Plaintiff  
William R. Miller

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

In Re:

WILLIAM R. MILLER, and all others  
similarly situated,  
Plaintiff,

v.

CRISIS COLLECTION MANAGEMENT, LLC,  
CHRISTOPHER ERIC MUMM and ROBERT  
H. BROILI,

Defendants.

Case No.: 2:22-cv-00262-JCM-BNW

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
THE DISCOVERY PLAN AND  
SCHEDULING ORDER**

**[FIRST REQUEST]**

COME NOW, Plaintiff, William R. Miller, an individual (“Miller”), and Defendants, Crisis Collection Management, LLC dba Crisis Collections (“Crisis Collections”), Christopher Eric Mumm, Esq. (“Mumm”), and Robert H. Broili, Esq. (“Broili”) (collectively, “Defendants”), by and through their respective undersigned counsel, hereby stipulate and request this Court for an extension of time as set forth below.

1. This is the First Stipulated Request for an Extension of Time to File Discovery Plan and Scheduling Order.

2. On October 27, 2022, this Court granted Defendants’ Motion to Dismiss (ECF No. 20) and entered judgment in favor of Defendants (ECF No. 21). Plaintiff appealed. (ECF No. 22). The Ninth Circuit Court of Appeals issued its Memorandum affirming the judgment in part and reversing the judgment in part. (ECF No. 24). Because this matter was appealed at the motion to dismiss stage, no discovery beyond initial disclosures was

completed prior to the appeal.

3. That because this case was remanded by the Ninth Circuit Court of Appeals, it was ordered on December 14, 2023, that the parties file a joint discovery plan and scheduling order no later than January 16, 2024 (ECF No. 26).

4. That on January 8, 2024 a Joint Status Report was filed (ECF No. 28).

5. That on January 12, 2024, Defendants filed their Answer to the Complaint (ECF No. 29).

6. That the parties are seeking a thirty (30) day extension until February 15, 2024 to file the Discovery Plan and Scheduling Order as parties are attempting to settle this matter.

7. The Parties are entering into this stipulation in good faith and not for purposes of delay.

**IT IS HEREBY STIPULATED.**

DATED this 15<sup>th</sup> day of January, 2024

Christopher P. Burke, Esq.  
218 S. Maryland Parkway  
Las Vegas, NV 89101

/s/ Christopher P. Burke, Esq.  
Christopher P. Burke, Esq.  
Nevada Bar No. 004093  
Attorney for Plaintiff

DATED this 15<sup>th</sup> day of January, 2024

Robison, Sharp, Sullivan & Brust  
71 Washington Street  
Reno, Nevada 89503

/s/Michaela G. Jones, Esq.  
Kent R. Robison, Esq.- NSB #1167  
Michaela G. Jones- NSB#15205  
Attorney for Defendants

**IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE

Dated: 1/16/2024